

**BEFORE THE  
FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, D. C.**

In the Matter of	)	
	)	
The Use of N11 Codes and Other	)	CC Docket No. 92-105
Abbreviated Dialing Arrangements	)	
	)	

**Comments of the Public Service  
Commission of the State of Missouri**

The Public Service Commission of the State of Missouri (“MoPSC”) offers the following comments in response to the Public Notice (“Notice”) released May 7, 2007, in which the Wireline Competition Bureau seeks comment on the status of the implementation of the 211 and 511 dialing codes.

**I. Implementation of the 211 Dialing Code in Missouri**

The Wireline Competition Bureau seeks comment on the status of 211 implementation to determine whether the 211 dialing code is being utilized in the manner in which it was assigned. The MoPSC designated Heart of America United Way (“HAUW”) as its first Information and Referral Provider (“I&R Provider”) effective June 18, 2004<sup>1</sup>. The designation was granted for a three year period in 131 exchanges covering sixteen counties in Missouri. In that same order, the MoPSC promulgated a rulemaking, 4 CSR 240-32.200, which set standards for the authorization of carriers to serve as a Missouri Information and Referral Provider

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<sup>1</sup> Order Approving Unanimous Stipulation and Agreement. *In the matter of the assignment of the 2-1-1 abbreviated dialing code in the state of Missouri*. Case No. AO-2004-0036.

(“Mo I&R Provider”). HAUW recently submitted a reapplication requesting to be authorized as the Mo I&R Provider in the same 131 exchanges for an additional three years.<sup>2</sup> That case is pending before the MoPSC.

Additionally, the United Way of Greater St. Louis (“UWGSL”) recently applied to be the Mo I&R Provider in all other Missouri exchanges. The MoPSC approved UWGSL’s application effective May 21, 2007<sup>3</sup>. According to statements in their application, UWGSL expects to offer 211 service in all authorized exchanges by December, 2007. In this respect 211 service should ultimately be available in all Missouri exchanges.

## II. Implementation of the 511 Dialing Code in Missouri

The Wireline Competition Bureau seeks comment on the status of 511 implementation to determine whether the 511 dialing code is being utilized in the manner in which it was assigned. The Missouri Department of Transportation (“MoDOT”) through a partnership arrangement with Traffic.com began providing traffic information utilizing the 511 dialing code on May 11, 2007. MoDOT elected to provide 511 service to St. Louis City and County, as well as Franklin, Jefferson and St. Charles counties because of significant road construction beginning in that area of the state. The 511 dialing code is not implemented in other areas of the state.

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<sup>2</sup> *In the Matter of the Reapplication of The Heart of America United Way for an Order of the Commission Granting it Continuing Authority as an Information and Referral Provider for purposes of 211 service.* Case No. TO-2007-0338.

<sup>3</sup> *Order Granting Authority to Serve as an Information and Referral Service Provider. In the Matter of the application of the United Way of Greater St. Louis, Inc. for an Order of the Commission Granting it Authority as an Information and Referral Provider for purposes of obtaining 211 service.* Case No. TO-2007-0312.

Although all carriers in MoDOT's 511 area should have the technical capability to complete the translations necessary to provide 511 service, MoDOT's use of 511 service is currently limited to three wireless carriers and two wireline carriers. At this time all four incumbent local telephone companies and eleven other facility-based wireline companies providing local voice service in MoDOT's 511 service area are not providing 511 service. MoDOT and Traffic.com officials are continuing to contact and order 511 service from more telecommunications carriers; however a carrier's desire to recover 511 service implementation costs directly from the 511 service provider has been an issue. An alternate toll free 8YY telephone number (877-4STL-511) is available for end users that do not have access to 511 service or for those customers residing outside the 511 service area.

### III. Issues Related to 211 and 511 Dialing Codes in Missouri

The Wireline Competition Bureau seeks input as to what can be done to facilitate more widespread use of the codes. The MoPSC notes that the *211/511 Assignment Order* does not contain guidance on cost recovery issues. Specifically, the Commission states,

We do not specify parameters for cost recovery and other technical issues, contrary to suggestions of some commenters. Instead, we leave with federal, state and local government transportation agencies the discretion to determine the deployment schedule and the type of transportation information that will be provided using 511, similar to how we handled this issue with respect to 311 in the *N11 First Report and Order*.<sup>4</sup> (footnotes omitted)

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<sup>4</sup> Third Report and Order and Order on Reconsideration. *In the Matter of Petition by the United States Department of Transportation for Assignment of an Abbreviated Dialing Code (N11) to Access Intelligent Transportation System (ITS) Services Nationwide. Request by the Alliance of Information and Referral Systems, United Way of America, United Way 211 (Atlanta, Georgia), United Way of Connecticut, Florida Alliance of Information and Referral Services, Inc., and Texas I&R Network for*

While additional guidance may not ensure wider code usage, the MoPSC notes that guidance regarding cost recovery issues may be useful. Recovery of costs associated with a carrier's provisioning of N11 dialing services is an issue that repeatedly surfaces in the implementation of most N11 dialing services<sup>5</sup>. Clear delegation of authority and guidance to state commissions regarding such issues could be helpful.

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*Assignment of 211 Dialing Code. The Use of N11 Codes and Other Abbreviated Dialing Arrangements.* Docket Nos. NSD-L-99-24, NSD-L-98-80, CC Docket No. 92-105. Released July 30, 2000. Par. 15.

<sup>5</sup> See also Report and Order. *In the Matter of Southwestern Bell Telephone, L.P. d/b/a AT&T Missouri's Revision to its General Exchange Tariff, PSC Mo. No. 35 Regarding Provision of 811 Service.* Case No. IT-2007-0187. Effective February 16, 2007.

Respectfully submitted,

/s/ John Van Eschen

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